

# COMMUNITY & ENVIRONMENTAL DEFENSE SERVICES

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May 4, 2009

Lloyd Spivak  
Maryland Public Service Commission  
Office of Staff Counsel  
6 Saint Paul Street  
Baltimore, Maryland 21202-6806

**RE: Dorchester Citizens for Safe Energy Data Request #1 of PSC Staff**

Dear Mr. Spivak:

Thank you for taking the time to speak with me this morning. This letter contains three requests I would like to make of the Commission.

1. Could my name be added to the service list for the Mid-Atlantic Power Pathway Case No. 9179?
2. I would like to discuss several questions regarding the PSC *Ten-Year Plan (2008 - 2017) of Electric Companies in Maryland*, dated February, 2009. The following section of the report, which appears at the bottom of page 26, provides one of the clearest, most concise descriptions I've seen of the need and benefits of the MAPP project.

*MD PSC Staff and DNR/PPRP have participated in community meetings sponsored by the applicant, most notably in Dorchester County. MAPP is primarily justified for the following reasons:*

1. *To extend the high voltage grid into southern Delmarva Peninsula which till now has been fed radially from the north;*
2. *To alleviate historical congestion problems in Delmarva, central Maryland, and northern Virginia. PJM's 2007 RTEP analysis determined that the MAPP Project would solve overloads on the eastern interface that would otherwise occur as early as 2012;*

3. *To extend the grid for open access and improve deliverability of load and generation. PHI analysis indicates that eastern PJM import capability would increase by 1,000-2,500 MW as a result of the MAPP project,*
4. *To compensate for retirements of power plants such as Buzzard Point, Benning Road, Vienna, and Indian River; and*
5. *To accommodate load growth in southern Maryland and the Eastern Shore.*

Following are my questions regarding the justifications presented above.

**JUSTIFICATION #1**

Is it correct to say that the concern regarding the radial feed is that electric service may be more easily interrupted when compared to other service configurations?

If yes, has an estimate been developed for the likelihood of a service interruption similar to the 15-year reliability criteria violation estimates used in the RTEP?

Do other options exist, in addition to MAPP, for addressing the radial feed concern? If yes, were these options fully explored in the PHI Needs Determination documents submitted last February to PSC?

**JUSTIFICATION #2**

The 2007 RTEP is referenced. Did the 2008 RTEP show that overloads on the eastern interface would still occur as early as 2012?

Where is the eastern interface located?

Would the overloads extend onto the Delmarva Peninsula?

Would the overloads manifest as brown-outs or other negative effects obvious to those who live and work on the Delmarva Peninsula?

**JUSTIFICATION #4**

I understand that consideration is being given to converting the Vienna plant to another form of electricity generation. Do you have any details on this?

**JUSTIFICATION #5**

Table A-5(a), on page 102, shows that the four utilities serving the Delmarva Peninsula have a forecasted peak demand of 4,485 MW as of 2008 which is projected to increase to 5,839 MW come the year 2022.

Is this the basis for the load growth estimate referenced in Justification #5?

Table A-5(a) also shows that the BGE Peak Demand Forecast would actually decrease by 86 MW between 2008 and 2022.

Why is it that electricity usage in the BGE service area is projected to decrease by 1.2% over the next 13 years while an increase of 30% is shown for the Delmarva Peninsula?

3. On April 30th I sent an e-mail to PSC engineer Craig Taborsky with the following question.

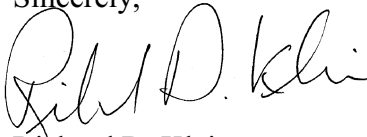
On page 148, of the PJM 2008 RTEP, the following paragraph appears under Possum Point - Salem 500 kV Circuit...

*PJM 2008 RTEP studies have identified the need for the Possum Point to Vienna and Indian River segments of the line in 2013. The addition of the MAPP project resolves load deliverability violations on the Delmarva peninsula beyond PJM's 15-year planning horizon and provides a robust long term solution for the future needs of the area.*

Does this mean that with current conditions load deliverability violations on the Delmarva peninsula will not occur until sometime after PJM's 15-year planning horizon?

In other words, that MAPP is needed to resolve load deliverability violations which are not project to occur until sometime after the year 2023?

Sincerely,



Richard D. Klein

cc: Libby Nagel, Dorchester Citizens for Safe Energy